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On April 6, 2001, Pacific Gas and Electric Company (the "Utility") filed a voluntary case under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of California (the "Court"), which was assigned Case No. 01-30923 DM (the "2001 Case"). A chapter 11 plan of reorganization for the Utility was confirmed on December 22, 2003 [Docket No. 14272]. As of the date hereof, the 2001 Case remains open and is pending before the Honorable Dennis Montali, United States Bankruptcy Judge.

On the date hereof, the Utility and PG&E Corporation ("PG&E Corp.," and, together with the Utility, the "Debtors") each filed with the Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the "2019 Cases"). A motion will be filed with the Court requesting that the 2019 Cases be consolidated for procedural purposes only and jointly administered, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure.

The Debtors submit that the 2001 Case and the 2019 Cases are related cases, as defined by Rule 1015-1 of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, and assignment to a single judge would promote efficient administration of the estates and avoid conflicting and inconsistent rulings.

Dated: January 29, 2019 WEIL, GOTSHAL & MANGES LLP KELLER & BENVENUTTI LLP

By: <u>/s/Tobias S. Keller</u>
Tobias S. Keller

Proposed Attorneys for Debtors and Debtors in Possession